

JENEITH A. DUNSON  
Name  
P.O. Box 19035  
Las Vegas NV  
89132  
Prison Number

✓ RECEIVED  
200 APR 27 P 3:45  
U.S. DISTRICT COURT  
DISTRICT OF NEVADA  
DEPUTY

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

JENEITH A. DUNSON,  
Plaintiff,  
vs.  
Wacken Hat Security,  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
Defendant(s).

CASE NO. 209 CV-2235 PMP-LRL  
(To be supplied by the Clerk)

Amended Complaint  
CIVIL RIGHTS COMPLAINT  
PURSUANT TO  
42 U.S.C. § 1983

A. JURISDICTION

1) This complaint alleges that the civil rights of Plaintiff, JENEITH DUNSON,  
(Print Plaintiff's name)

who presently resides at P.O. Box 19035, were

violated by the actions of the below named individuals which were directed against  
Plaintiff at Las Vegas NV 89132 on the following dates  
(institution/city where violation occurred)

\_\_\_\_\_, and \_\_\_\_\_  
(Count I) (Count II) (Count III)

**Make a copy of this page to provide the below  
information if you are naming more than five (5) defendants**

2) Defendant Larry Lalo resides at Wackenhut Security  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_

3) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_

4) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_

5) Defendant \_\_\_\_\_ resides at \_\_\_\_\_  
(full name of first defendant) (address if first defendant)  
and is employed as \_\_\_\_\_. This defendant is sued in his/her  
(defendant's position and title, if any)  
\_\_\_\_ individual \_\_\_\_ official capacity. (Check one or both). Explain how this defendant was  
acting

under color of law: \_\_\_\_\_  
\_\_\_\_\_



COUNT I

The following civil rights has been violated: \_\_\_\_\_

Supporting Facts: [Include all fact you consider important. State the facts clearly, in your own words, and without citing legal authority or argument. Be sure you describe exactly what each specific defendant (by name) did to violate your rights].

→ when no tangible employment action is taken employer, Intimidating or offensive work environment plaintiff must establish; by totality of circumstances existence of hostile or abusive environment which is severe enough to affect psychological stability of minority employee. Civil Rights Act 1964 § 701 et USCA 2000e et seq. Amon v





outline).

- a) Defendants: \_\_\_\_\_
- b) Name of court and docket number: \_\_\_\_\_
- c) Disposition (for example, was the case dismissed , appealed or is it still pending?):  
\_\_\_\_\_
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 2) Have you filed an action in federal court that was **dismissed because it was determined to be frivolous, malicious, or failed to state a claim upon which relief could be granted?**  
\_\_\_\_ Yes \_\_\_\_ No. If your answer is "Yes", describe each lawsuit. (If you had more than three actions dismissed based on the above reasons, describe the others on an additional page following the below outline.)

Lawsuit #1 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_.
- b) Name of court and case number: \_\_\_\_\_.
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #2 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_.
- b) Name of court and case number: \_\_\_\_\_.

- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

Lawsuit #3 dismissed as frivolous, malicious, or failed to state a claim:

- a) Defendants: \_\_\_\_\_
- b) Name of court and case number: \_\_\_\_\_
- c) The case was dismissed because it was found to be (check one): \_\_\_\_\_ frivolous  
\_\_\_\_\_ malicious or \_\_\_\_\_ failed to state a claim upon which relief could be granted.
- d) Issues raised: \_\_\_\_\_  
\_\_\_\_\_
- e) Approximate date it was filed: \_\_\_\_\_
- f) Approximate date of disposition: \_\_\_\_\_

- 3) Have you attempted to resolve the dispute stated in this action by seeking relief from the proper administrative officials, e.g., have you exhausted available administrative grievance procedures? \_\_\_\_ Yes \_\_\_\_ No. If your answer is "No", did you not attempt administrative relief because the dispute involved the validity of a: (1) \_\_\_\_ disciplinary hearing; (2) \_\_\_\_ state or federal court decision; (3) \_\_\_\_ state or federal law or regulation; (4) \_\_\_\_ parole board decision; or (5) \_\_\_\_ other \_\_\_\_.
- If your answer is "Yes", provide the following information. Grievance Number \_\_\_\_.
- Date and institution where grievance was filed \_\_\_\_.

Response to grievance: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



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**E. REQUEST FOR RELIEF**

I believe that I am entitled to the following relief:

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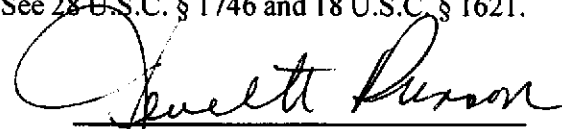
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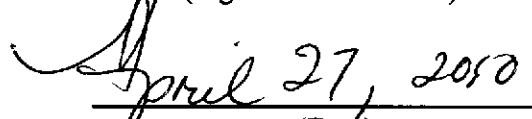
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I understand that a false statement or answer to any question in this complaint will subject me to penalties of perjury. **I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.** See 28 U.S.C. § 1746 and 18 U.S.C. § 1621.

\_\_\_\_\_  
(Name of Person who prepared or helped  
prepare this complaint if not Plaintiff)

  
\_\_\_\_\_  
(Signature of Plaintiff)

  
\_\_\_\_\_  
(Date)

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(Additional space if needed; identify what is being continued)

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